

### REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-22 and 24-32 are pending in the application. Claims 1, 7, 10, 12, 27 and 31 are amended by the present amendment. Support for the amended claims can be found in the original specification, claims and drawings.<sup>1</sup> No new matter is presented.

In the Office Action, Claims 1-19, 24, 25 and 27-32 are rejected under 35 U.S.C. § 102(b) as anticipated by Gennaro et al. (U.S. Pat. 6,317,834, herein Gennaro); Claims 20-22 are rejected under 35 U.S.C. § 103 as unpatentable over Gennaro in view of Wheeler (U.S. Pub. 2002/0026575); and Claim 26 is rejected under 35 U.S.C. § 103(a) as unpatentable over Gennaro.

In response to the above noted rejection under 35 U.S.C. § 102, Applicant respectfully submits that amended independent Claims 1, 7, 10, 12, 27 and 31 recite novel features clearly not disclosed by Gennaro.

Amended independent Claim 1, for example, recites, in part, an information providing device arranged in a multi-function peripheral system including multiple image formation applications and a platform, the platform including an OS and at least one control service to control execution of a requested processing according to a function call from one of the image formation applications, the information providing device comprising:

... a third unit configured to generate an authentication merge ticket including data indicating at least one of an authentication provider name, a term of validity of the ticket, an authentication domain name, and user attributes, the authentication merge ticket being a unified information item generated by combining the first user information item and the second user information item based on the predetermined identification data ...

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<sup>1</sup> e.g., specification, at least at p. 67, l. 23 – p. 68, l. 13 and Fig. 23; p. 74, ll. 5-11 and Fig. 25; and p. 38, ll. 10-18 and Fig. 9.

Independent Claims 7, 10, 12, 27 and 31, while directed to alternative embodiments, are amended recite similar features. Accordingly, the remarks and arguments presented below are applicable to each of independent Claims 1, 7, 10, 12, 27 and 31.

Turning to the applied reference, Gennaro describes user authentication method (Fig. 4b) which uses an identifier 28, a password 30, and a biometric sample 32 to grant a user 26 access to a database.

Gennaro, however, fails to disclose “an information providing device arranged in a multi-function peripheral system including multiple image formation applications and a platform, the platform including an OS and at least one control service to control execution of a requested processing according to a function call from one of the image formation applications”, as recited in amended Claim 1. Moreover, Gennaro does not teach or suggest the claimed feature of “generat[ing] an authentication merge ticket including data indicating at least one of an authentication provider name, a term of validity of the ticket, an authentication domain name, and user attributes, the authentication merge ticket being a unified information item generated by combining the first user information item and the second user information item based on the predetermined identification data”, which is also a feature required by amended independent Claim 1.

In rejecting the claimed features directed to generating the authentication ticket, the Office Action cites col. 8, lines 37-47 of Gennaro. This cited portion of Gennaro describes that a statistical equivalence score is generated from the comparison of a current biometric sample (S') with a decrypted biometric model (T). A decision is made to determine if the computed score is acceptable. If not, the user's authorization state is declared as failed, otherwise, an acceptable score will result in granting the individual access.

Thus, the statistical equivalence score of Gennaro is clearly different from an “authentication merge ticket including data indicating at least one of an authentication

provider name, a term of validity of the ticket, an authentication domain name, and user attributes”, as recited in independent Claim 1. The score according to Gennaro is generated from the comparison of the current biometric sample (S') with the decrypted biometric model (T), and it is merely compared with a threshold to determine if the user is granted to access the database.

On the other hand, the authentication merge ticket (e.g., “merge ticket” created by the merge provider 16) according to the claimed configuration is a unified information item generated by combining the first user information item (e.g., “master primary ticket” created by the merge provider 16) and the second user information item (e.g., “authentication primary ticket” created by the password authentication provider 17). The authentication merge ticket generated is then used to limit the range of validity over the plurality of information providers. Gennaro fails to teach or suggest a similar configuration.

Gennaro, therefore, fails to disclose “an information providing device arranged in a multi-function peripheral system including multiple image formation applications and a platform, the platform including an OS and at least one control service to control execution of a requested processing according to a function call from one of the image formation applications”, as recited in amended Claim 1. Moreover, Gennaro does not teach or suggest the claimed feature of “generat[ing] an authentication merge ticket including data indicating at least one of an authentication provider name, a term of validity of the ticket, an authentication domain name, and user attributes, the authentication merge ticket being a unified information item generated by combining the first user information item and the second user information item based on the predetermined identification data”, which is also a feature required by amended independent Claim 1.

Accordingly, Applicant respectfully requests that the rejection of Claim 1 (and the claims that depend therefrom) under 35 U.S.C. § 102 be withdrawn. For substantially similar

reasons, it is also submitted that independent Claims 7, 10, 12, 27 and 32 (and the claims that depend therefrom) patentable define over Gennaro.

Regarding the rejection of Claims 20-22 under 35 U.S.C. § 103 as unpatentable over Gennaro in view of Wheeler, these claims ultimately depend from independent Claim 12, and are believed to be patentable for at least the reasons discussed above. Further, Applicant respectfully submits that Wheeler fails to remedy the above-noted deficiencies of Gennaro.

Accordingly, Applicant respectfully requests the rejection of Claims 20-22 under 35 U.S.C. § 103 be withdrawn.

Consequently, in view of the present amendment and in light of the foregoing comments, it is respectfully submitted that the invention defined by Claims 1-22 and 24-32 is definite and patentably distinguishing over the applied references. The present application is therefore believed to be in condition for formal allowance and an early and favorable reconsideration of the application is therefore requested.

Respectfully submitted,

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